

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • Steven M. Matlock, Director

DIVISION OF ENVIRONMENTAL QUALITY

Northeast Regional Office

1709 Prospect Drive Macon, MO 63552-2602

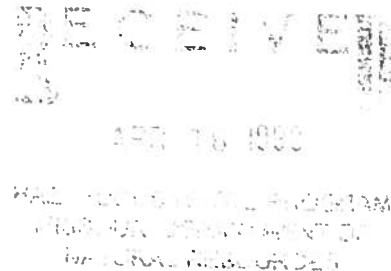
(660) 385-2129

FAX (660) 385-6398

Certified Mail
P 279 217 815
2.000 Hazardous Waste General
Ralls County - LOW #98-NE.003

April 13, 1998

Mr. Leslie Smith
Centerline Industries, Inc.
Route 3, Highway 79 South
Hannibal, MO 63401



Dear Mr. Smith :

Enclosed is a copy of the Missouri Hazardous Waste Management Law Compliance Evaluation Inspection Report for the March 18, 1998 inspection of Centerline Industries, Inc. near Hannibal, Missouri. The inspection was conducted by Mr. Darryl McCullough of the Missouri Department of Natural Resources' Northeast Regional Office. I believe the report is self-explanatory.

The inspection revealed that Centerline Industries, Inc. is a Conditionally Exempt Small Quantity Generator of hazardous waste. At the time of the inspection, one unsatisfactory feature was observed. Please correct this unsatisfactory feature and submit written documentation to this office verifying that this has been completed by **May 1, 1998**.

Should you have any questions, you may contact Mr. McCullough or Mr. Sam Wilson in this office at (660) 385-2129.

Sincerely,

NORTHEAST REGIONAL OFFICE

ORIGINAL
SIGNED BY

Charles S. Decker, P.E.
Regional Director

CSD/dmt

c: Hazardous Waste Management Program

Enclosure



R00132534
RCRA RECORDS CENTER

MISSOURI HAZARDOUS WASTE MANAGEMENT LAW COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY:

Centerline Industries, Inc.
Route #3, Highway 79 South
Hannibal, Missouri 63401
(573) 248-0721

EPA ID: MOD054078324
MO ID: 004692

PARTICIPANTS:

Centerline Industries, Inc.

Leslie Smith
Production Supervisor

Charlie Shearon
Production Supervisor

Department of Natural Resources

Darryl McCullough
Environmental Specialist
Northeast Regional Office

RECEIVED
APR 18 1998
MISSOURI DEPARTMENT OF
NATURAL RESOURCES

INTRODUCTION:

A compliance evaluation inspection was conducted of the hazardous waste management activities of Centerline Industries, Inc. at Hannibal, Missouri on March 18, 1998. The evaluation was conducted to determine compliance with the Missouri Hazardous Waste Management Law and Regulations. The inspection was conducted under authority of Sections 260.375(9) and 260.377 RSMo.

FACILITY DESCRIPTION:

The Centerline Industries, Inc. facility is located along Highway 79 south of Hannibal near Saverton, Missouri. The facility is located in a rural area of Ralls County with no other industries or residences located nearby. The Centerline Industries facility manufactures and containerizes white and yellow paint used for highway striping. Various ingredients including pigment solids, solvents, carriers and driers are blended in large mixing vats to produce paint.

In the past, Centerline operated as a Large Quantity Generator of hazardous waste. Changes in raw materials used has resulted in a drastic decline in the amount of hazardous waste generated. The major change in operations was a discontinuation of the manufacturing of oil based paints containing lead and chromium. Most paint presently manufactured at the facility is latex based and analysis of the filter waste from this process indicated that it is non-hazardous waste. The facility generates approximately 5021 kilograms of this non-hazardous waste per month. The material is shipped to Rineco Chemical in Benton, Arkansas.

MHWML Compliance Evaluation Inspection Report
Centerline Industries, Inc.
Page 2

As a further method to decrease waste generated at the facility, Centerline no longer services their own vehicles and forklifts, thus they do not generate used oil. All service on equipment is performed by offsite contractors who collect all used oil for recycling.

As a result of their operations, one hazardous waste stream is generated. Waste Paint (D001, D008, D007, D018, D035, F005) is generated on an occasional basis from the manufacturing of lead based paints. This material consists of waste generated when changing filters between batches of paint. Approximately 1/3 of a 55 gallon drum of this material was in satellite storage at the facility at the time of the inspection. The material is removed from the site and transported by SLT Express, Inc. (H-1959) to Rineco Chemical in Benton, Arkansas (ARD981057870).

The Centerline Industries, Inc. facility near Hannibal, Missouri is a Conditionally Exempt Small Quantity Generator of hazardous waste.

UNSATISFACTORY FEATURES:

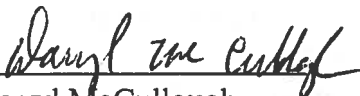
1. Failure to mark satellite containers with beginning date of accumulation; 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(ii) as amended by 10 CSR 25-5.262(2)(C)3. At the time of the inspection, one 55 gallon satellite container was observed with no date of accumulation. This date must be placed on the container to assure that containers are not kept in satellite storage for more than one year.


COMMENTS:

At the time of the inspection, one satellite accumulation drum was observed at the facility. Since there was no date of accumulation marked on the satellite container, it is not known how long this drum was in satellite storage. A review of facility records revealed that the last hazardous waste shipment from the facility occurred on December 11, 1996. The facility personnel should be reminded that hazardous waste can only be held in satellite storage for up to one year.

Submitted by:

Reviewed By:


Darryl McCullough
Environmental Specialist III


Sam Wilson
Environmental Specialist IV

DM/tdr



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
SMALL QUANTITY GENERATOR
INSPECTION RECORD AND CHECKLIST

S

SQG-INSP

ONLY FOR FACILITIES THAT GENERATE/ACCUMULATE < 1000 Kg (2,200 lbs. or approximately 5 drums)

NAME Centerline Industries, Inc.		DATE 3-18-98		EPA ID NUMBER MO D 05410 78324	
ADDRESS Rt 3 Hwy 79 South		RR NO		MO ID NUMBER 004692	
CITY Hannibal	COUNTY Ralls	# OF EMPLOYEES 18	YEARS AT SITE 18.2	TELEPHONE NUMBER 573 248 0711	
FACILITY REPRESENTATIVE(S), TITLE(S) Les Smith, Charlie Shearon, Plant Supervisors					
DATE(S) OF LAST INSPECTION(S) July 16, 1993					
LATITUDE DEG ____ MIN ____ SEC ____			LONGITUDE DEG ____ MIN ____ SEC ____		

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT

Facility manufactures and containerizes white and yellow paint used for highway striping. Pigment solids, solvents, carriers and driers are blended in mixing vats to produce paint. Most paint currently manufactured is latex based. Facility no longer manufactures oil based paint containing lead and chromium.

WASTE STREAMS

	DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA WASTE CODE(S)	DISPOSITION
1.	Water Based Paint (Non Regulated)	approx. 5021 kg/month	none non-hazardous	RineCo
2.	Waste Paint	1/3 55g. drum in in 1997	D001, D007, D008, D018, D035, F005	RineCo
3.				
4.				
5.				



A. GENERAL

1. <input checked="" type="checkbox"/> Registered as a hazardous waste generator - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262 (2)(A).	1	GGR	COMMENTS
2. <input checked="" type="checkbox"/> Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11.	1	GGR	
3. <input checked="" type="checkbox"/> Utilizes a licensed hazardous waste transporter - Section 260.380.1(5) RSMo.	1	GGR	
4. <input checked="" type="checkbox"/> Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo.	1	GGR	
5. <input checked="" type="checkbox"/> Facility does not operate as a TSD - Section 260.390(1) RSMo.	1	GGR	

PART 1: WALK-THROUGH INSPECTION**B. PRETRANSPORT, CONTAINERIZATION & STORAGE**

1. <input checked="" type="checkbox"/> Storage does not exceed 180 days 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d) or 270 days if transported > 200 miles - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(e) N/H	1	GSQ	COMMENTS No hazardous waste in storage at time of inspection.
2. <input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.171. N/H	1	GPT	
3. <input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.172. N/H	1	GPT	
4. <input checked="" type="checkbox"/> Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.173(a). N/H	1	GPT	
5. <input checked="" type="checkbox"/> Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.177(c). N/H	1	GPT	
6. <input checked="" type="checkbox"/> Containers of ignitable or reactive waste stored > 50 ft. from property line (or meet requirements) - 10 CSR 25-5.262(2)(C)6 referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265(2)(I) 7 and 8. N/H	2	GOR	
7. <input type="checkbox"/> Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262(2)(C)1. N/H	2	GOR	
8. <input type="checkbox"/> Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2). N/H	2	GPT	
9. <input type="checkbox"/> Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.D.(II). N/H	2	GOR	
10. <input type="checkbox"/> Containers clearly marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3). N/H	2	GPT	
11. <input type="checkbox"/> Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.C.(II) referencing 40 CFR 265.174. N/H	2	GPT	
12. <input type="checkbox"/> Daily inspection of areas subject to spills, i.e., waste handling areas - 10 CSR 25-5.262(2)(C)2.C.(II) referencing 40 CFR 265.195. N/H	2	GOR	
13. <input type="checkbox"/> Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.35. N/H	2	GPT	
14. <input type="checkbox"/> Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33. N/H	2	GPT	
15. <input type="checkbox"/> "No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.F.(II). N/H	2	GOR	

C. SATELLITE ACCUMULATION

1. <input checked="" type="checkbox"/> Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a).	1	GPT	COMMENTS 1/3 55 gal drum in satellite storage. No beginning date.
2. <input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171.	1	GPT	
3. <input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172.	1	GPT	
4. <input checked="" type="checkbox"/> Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1).	1	GPT	
5. <input checked="" type="checkbox"/> Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(2).	1	GPT	
6. <input type="checkbox"/> Container marked identifying contents & beginning date - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(ii) as amended by 10 CSR 25-5.262(2)(C)2. N/H	2	GOR	

7. <input checked="" type="checkbox"/> Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.	2	GOR	COMMENTS
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D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1. <input checked="" type="checkbox"/> Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.31.	1	GPT	COMMENTS N/A CESQC
2. <input type="checkbox"/> Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) and properly tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32 as amended by 10 CSR 25-5.262(2)(C)2.G.	2	GPT	
3. <input type="checkbox"/> Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(c) and (d).	2	GPT	
4. <input type="checkbox"/> Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.33.	2	GPT	COMMENTS N/A CESQC
5. <input type="checkbox"/> Emergency coordinator's name and phone number posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii).	2	GSQ	
6. <input type="checkbox"/> Telephone number of fire department posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii).	2	GSQ	
7. <input type="checkbox"/> Location of fire extinguisher and spill control equipment posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii).	2	GSQ	
8. <input type="checkbox"/> Employees familiar with waste handling and emergency procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(iii).	2	GSQ	
9. <input type="checkbox"/> Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a).	2	GPT	
10. <input type="checkbox"/> Telephone or two-way radio on-site and capable of summoning local fire or police dept. - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(b).	2	GPT	

E. SQG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1. N/A				
2.				
3.				

1. <input type="checkbox"/> Uncovered tanks have 2 ft. freeboard or containment system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(3).	1	GPT	COMMENTS N/A No hazardous waste tanks.
2. <input type="checkbox"/> Continuously fed tanks equipped with a feed cut-off system or a proper by-pass system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(4).	1	GPT	
3. <input type="checkbox"/> Waste and/or treatment method is compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(2).	1	GPT	
4. <input type="checkbox"/> Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(f)(1).	1	GPT	
5. <input type="checkbox"/> Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(1).	1	GPT	
6. <input type="checkbox"/> Ignitable or reactive wastes in covered tanks treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(2).	1	GPT	
7. <input type="checkbox"/> Volatiles with vapor pressure > 78 mm Hg @ 25° C not placed in open tanks - 10 CSR 25-5.262(2)(C)2.F.(I).	1	GOR	
8. <input type="checkbox"/> Wastes and residues removed from tank and equipment, and handled properly upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(d).	1	GPT	
9. <input type="checkbox"/> Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3).	2	GPT	



10. <input type="checkbox"/> Inspection of waste feed cut off, bypass system, monitoring data and freeboard each operating day - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c).	2	GPT	N/A	COMMENTS
11. <input type="checkbox"/> Weekly inspection of confinement structure, construction materials and general area for leaks, corrosion or discharges - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)5.	2	GPT		

PART 2: RECORDS INSPECTION

F. MANIFESTS

1. <input checked="" type="checkbox"/> Facility uses manifest system or wastes reclaimed under contractual agreement - 260.380.1(6) RSMo and 10 CSR 25-5.262(2)(B) or 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(e)1.	1	GMR	N/A	COMMENTS
2. <input checked="" type="checkbox"/> Generator maintains a copy of the reclamation agreement on-site for at least 3 years after expiration of agreement - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(e)(2).	2	GMR		
3. <input checked="" type="checkbox"/> Records maintained for a 3 year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a).	2	GRR		
4. <input checked="" type="checkbox"/> Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a) as amended by 10 CSR 25-5.262(2)(B)1.	2	GOR		
5. <input checked="" type="checkbox"/> Manifest document ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A.	2	GOR		
6. <input checked="" type="checkbox"/> Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)1.	2	GMR		
7. <input checked="" type="checkbox"/> All transporters' names, phone numbers, license plate #s, MO & EPA I.D.#s - 10 CSR 25-5.262(2)(B)1 and 2.	2	GMR		
8. <input checked="" type="checkbox"/> Designated facility name, address, phone, MO & EPA I.D.#, - 10 CSR 25-5.262(2)(B)1 and 2.	2	GMR		
9. <input checked="" type="checkbox"/> DOT shipping name, Hazard Class and waste I.D. # (RQ - if required)- 10 CSR 25-5.262(2)(B) 1 and 2.	2	GMR		
10. <input checked="" type="checkbox"/> Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)B 1 and 2.	2	GMR		
11. <input checked="" type="checkbox"/> Manifest signed and dated - 10 CSR 25-5.262(2)B 1.	2	GMR		
12. <input checked="" type="checkbox"/> Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A.	2	GOR		
13. <input checked="" type="checkbox"/> Manifest continuation sheets are not used - 10 CSR 25-5.262(2) (B)1 .	2	GOR		
14. <input checked="" type="checkbox"/> Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C .	2	GRR		
15. <input checked="" type="checkbox"/> Manifest summary reports and manifests sent to DNR quarterly OR annually if one shipment or no shipments are made - 10 CSR 25-5.262(2)(D)1.B and 10 CSR 25-5.262(2)(D)1.E.	2	GOR		
16. <input checked="" type="checkbox"/> Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a).	2	GLB		
17. <input checked="" type="checkbox"/> "Land-Ban" notification/certification sent with manifests or with 1st shipment under a tolling agreement. - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a).	2	GLB		
18. <input checked="" type="checkbox"/> Notification/certification includes correct EPA hazardous waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(b)(4) and (5).	2	GLB		

G. PREPAREDNESS AND PREVENTION

1. <input type="checkbox"/> Arrangements with local emergency agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37.	2	GPT	N/A	COMMENTS
2. <input type="checkbox"/> Emergency coordinator(s) on premise or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(i).	2	GSQ		

H. USED OIL STORAGE

1. <input type="checkbox"/> Used oil is managed properly and not disposed of into the environment or cause a public nuisance - 10 CSR 25-11.279(2)(B)4.B.	1	N/A	No waste oil stored.
2. <input type="checkbox"/> Containers in good condition - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(b)(1).	2		
3. <input type="checkbox"/> Containers storing used oil are not leaking - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(b)(2).	2		



[The text in this section is extremely faint and illegible. It appears to be a multi-paragraph document, possibly a letter or a report, with several lines of text visible across the page. The content is too blurry to transcribe accurately.]

4. <input type="checkbox"/> Containers/aboveground tanks are labeled or marked clearly "Used Oil" - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(c)(1).	2	} N/A	COMMENTS
5. <input type="checkbox"/> Fill pipes used to transfer used oil into underground storage tanks are labeled or marked clearly "Used Oil" - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(c)(2).	2		
6. <input type="checkbox"/> Containers/tanks which are exposed to rainfall are closed - 10 CSR 25-11.279(2)(C)6.	2		
7. <input type="checkbox"/> Clean up any spills or leaks of used oil - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(d).	2		
8. <input type="checkbox"/> Mixtures of used oil and hazardous waste are properly managed - 10 CSR 25-11.279(2)(B)(2).	2		

I. ON-SITE BURNING

1. <input type="checkbox"/> Burn only their own used oil or used oil from DIY'ers or exempt farmers - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(a).	1	} N/A	COMMENTS
2. <input type="checkbox"/> Burn only in space heaters with design capacity < .5 million BTU/hr - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(b).	1		
3. <input type="checkbox"/> Combustion gases from the heater are vented to the ambient air - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(c).	1		

J. OFF-SITE SHIPMENTS TO APPROVED COLLECTION CENTERS

1. <input type="checkbox"/> Used oil is transported by transporters who have obtained EPA N/A identification numbers - 10 CSR 11.279(1) incorporating 40 CFR 279.24. (If no licensed transporter is used)	1		
2. <input type="checkbox"/> Transports used oil in a vehicle owned by the generator or owned by an employee of the generator - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(1)	2		
3. <input type="checkbox"/> Transports no more than 55 gallons of used oil at any time - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(2).	2		
4. <input type="checkbox"/> Transports the used oil to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(3).	2		
OR			
5. <input type="checkbox"/> Transports the used oil to an aggregation point that is owned and/or operated by the same generator - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(b)(3).	2		
OR			
6. <input checked="" type="checkbox"/> Used oil is reclaimed under a contractual agreement (tolling arrangement) - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(c).	2		

K. RESOURCE RECOVERY

1. <input type="checkbox"/> RR certification for energy recovery or reclamation of hazardous waste on-site - 10 CSR 25-9.020(1)(A)3.	1	GOR	} N/A No Resource Recovery	COMMENTS	
2. <input type="checkbox"/> Still bottoms or RR residues disposed of properly - Section 260.380.1(7) RSMo.	1	GOR			
3. <input type="checkbox"/> Facility is classified as U, R1, or R2 accurately - 10 CSR 25-9.020(3)(A).	2	GOR			COMMENTS
4. <input type="checkbox"/> Facility meets the operating conditions of certification - 10 CSR 25-9.020(3).	2	GOR			
5. <input type="checkbox"/> Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E) 1 and 2.	2	GOR			
6. <input type="checkbox"/> Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6 referencing 10 CSR 25-7.264(2)(E)3.	2	GOR			
7. <input type="checkbox"/> Facility maintains a complete written operating record - 10 CSR 25-9.020(3)(E)5 referencing 40 CFR 264.73(b)(1) and (2) as modified by 10 CSR 25-7.264(2)(E)2.	2	GOR			
8. <input type="checkbox"/> Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.103 and 40 CFR 266.103	2	GOR			

CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable.

An item emphasized by a black line on the left is a serious deviation from the requirements (Class I violation).

An unemphasized item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I).

COMMENTS: INCLUDE DISCUSSION OF FACILITIES WASTE MINIMIZATION PLAN

Facility has drastically reduced quantity of hazardous waste generated, and has went from a large quantity generator to a conditionally exempt small quantity generator.

Check all Potential Multi-Media Violations and Impacts (specify and comment below if possible)

APC		PDW	
<input type="checkbox"/> Fugitive Dust	<input type="checkbox"/> Asbestos	<input type="checkbox"/> Taste & Odors	<input type="checkbox"/> Color
<input type="checkbox"/> Particulate	<input type="checkbox"/> Odors	<input type="checkbox"/> Bacteria	<input type="checkbox"/> Flow
<input type="checkbox"/> Burning	<input type="checkbox"/> Toxics	<input type="checkbox"/> Pressure	<input type="checkbox"/> Toxics
<input type="checkbox"/> Other		<input type="checkbox"/> Other	
SWM		HW	
<input type="checkbox"/> Open Dumps	<input type="checkbox"/> SLF	<input type="checkbox"/> Transportation	<input type="checkbox"/> USTs/LUSTs
<input type="checkbox"/> Littering	<input type="checkbox"/> Other	<input type="checkbox"/> PCBs	<input type="checkbox"/> Other
<input type="checkbox"/> Waste Tire Dump			
WPC			
<input type="checkbox"/> Animal Waste	<input type="checkbox"/> Sawdust	<input type="checkbox"/> Ground Water	
<input type="checkbox"/> Bypassing	<input type="checkbox"/> Sludge	<input type="checkbox"/> Storm Water	
<input type="checkbox"/> Treatment Plant Oper.	<input type="checkbox"/> Single Family	<input type="checkbox"/> Other	

COMMENTS:

INSPECTOR'S SIGNATURE

David M. G. Howard

DATE

3/19/98

